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School of Forestry

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To Whom It May Concern:

I am enclosing a copy of a report on the Ten Lakes Area on the Kootenai National Forest.

Joe Gaab, Wilderness liason officer for the Montana Fish and Game, has requested orally that this report be distributed to the following people:

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Received
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SEP 18 1974

Info Act

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Honorable Mike Mansfield
U.S. Senate
Washington, D.C.

Honorable Lee Metcalf
U.S. Senate
Washington, D.C.

Honorable Richard Shoup
House of Representatives
Washington, D.C.

The views expressed in the report do not necessarily represent those of the Wilderness Institute.

Sincerely yours,

Robert R. Ream

Robert R. Ream

RRR/ndo

REPORT AND COMMENTS ON TEN LAKES AREA

REPORT

The Ten Lakes area is a high lake country located in the verdant northwest of Montana. It lies in the northeast corner of the Kootenai National Forest adjacent to Canada and offers views eastward to the peaks in the U.S. Glacier National Park and the Canadian Waterton Lakes National Park.

Having heard about the outstanding scenic and wild values of the area and being unfamiliar with the country, Joe Gaab, wilderness liaison officer of the Montana Fish and Game Department; Jack Bright, Fish and Game Warden; Lee Winters of the Flathead County Planning Board; Don Aldrich, Executive Secretary of the Montana Wildlife Federation; and Medora Bass, field studies coordinator at the Wilderness Institute, planned a visit. On August 2, 1974, Joe Gaab left Livingston with his two Fish and Game horses; the next day he picked up Don and Medora in Missoula and drove to Fortine and rendezvoused with Lee, Jack (and his three horses), and Loren Netzoff, also a Fish and Game Warden. Not having the time to join us on the trip, Loren showed us a good spot to set up base camp and suggested day trips.

We set up camp in an area recently logged just west of Little Therriault Lake. We didn't camp within the classified Scenic Area because of limited forage, the fragile nature of the country, and the official policy which discourages overnight horse use. The first day we rode into the Scenic Area passing Paradise and Bluebird Lakes and Green Mountain to

Poorman Peak. The trail was marked with etched stone signs which blended in very well with the natural setting. Then we turned eastward following the east-west ridge just south of Rainbow Lake. We encountered two parties of backpackers who had had little luck fishing, partially due to the fact that there had been a fish kill in Bluebird Lake where the exceptionally long winter had depleted the oxygen supply. We also saw numerous recent grizzly bear digging sites and saw fresh tracks. Once we reached Rainbow Lake we dismounted and munched on lunches varying from candy bars to leftover steak. Then we returned to camp at a much faster rate than we set out at due to the horses' instinct to "return to the barn." This eighteen-mile trip provided an opportunity to view practically all of the Scenic Area.

The next day we set out from Big Therriault Lake in a southeasterly direction and ascended Stahl Peak which offered views of distant ranges and nearby lakes and escarpments. This day we saw fresh spore and tracks indicating a grizzly had been on the trail just minutes ahead of us. Heading back to camp we stopped to catch a view of the Eureka valley from Therriault Pass and then followed the trail homeward along the base of the St. Clair Peak cliffs; we sighted moose and elk tracks on the way. That night Dean Weeden, the Fortine District Ranger, visited our camp, joined us in our joyous mood following a good day, told us much about the area, and answered numerous questions. In general, he shared our growing appreciation of the area.

COMMENT ON EIS

Having a draft environmental impact statement for the Eureka-Grave Creek planning unit, we became familiar with directives and started to

develop some ideas about management based on our visit. There are many positive aspects of the draft EIS. The plan proposes the extension of the Scenic Area into the northeast point of the four-pointed, slender, star-shaped roadless area (see map #2) and establishes a unit for grizzly bear habitat management. Numerous logging roads are already closed (see map #4) and the plan establishes the policy of closing roads where they affect grizzly bear habitat and game winter range. The EIS indicates a movement away from using clear cutting predominantly. Clear cutting is an appropriate silvicultural method for some species in certain locations. But its use is questionable for subalpine fir which is a tolerant species, and in an area where climatic conditions are already harsh, where cover is needed to soak up moisture in this high rainfall zone, where scenery is one of the outstanding values of the area, and where grizzly bears are affected. The movement toward intensive timber management on prime timber lands is also laudable in that it reduces conflict with other of the multiple uses.

We felt the EIS had some shortcomings. First, the option of Wilderness classification was not considered for Roadless Areas #275 and 170. Second, the EIS does not indicate that boundaries of the Roadless Areas as delineated during the RARE process were re-examined. Since these boundaries were hastily drawn, study of the accuracy of these boundaries and their redrawing where required would have been appropriate during the unit planning process. Third, the benefits of retaining much of the roadless area in its primitive condition are not considered adequately; the national benefits, for example, are not brought forth. Fourth, the EIS is weak in identifying the major values of the area. The EIS poses the

values of primitive recreation, viewing, and wildlife. Recreation is an important value; in this area it is associated mostly with the scenery. However, the EIS does not point out the outstanding value of the scenery of this area in relation to other areas in the region. The EIS does not speak to the significance of the scenic value locally and nationally. Nor does the EIS point out that a unique characteristic of the area is that it is both very scenic and very accessible; only a short walk is required to be in the heart of the Scenic Area from the Wigwam road head. In considering viewing the emphasis in the EIS is on scenery as seen from below, from a car for example, as opposed to from above, from a mountain top. Not only is a view different from the top of a mountain but it is more extensive. The view from the mountain tops of the lake country and distant ranges is not adequately considered or protected in the EIS. In considering wildlife in the roadless area, mention is made of the presence of bear; grizzly bear, a species whose habitat is becoming increasingly threatened, is not specified in the description of the roadless area. Neither is mention made of sightings of woodland caribou and Ptarmigan, both of which are rare in Montana. The EIS does not mention that the area is one of the most ideal habitats available anywhere for the Northern Rocky Mountain wolf now classified as endangered. A number of sightings have been reported in the vicinity in recent years; wolves are also found in Canada just to the north. The EIS does not include wildness per se as a value of the area. This value is significant especially because of the Ten Lakes' location as an enclave in a region which is heavily logged. Neither does the EIS include as a value of the area its potential as a gene pool.

This value is difficult to comprehend but is becoming of more concern as the network of human society becomes larger, more complex, and more removed from its natural setting.

RECOMMENDATIONS

We would like to pose for your consideration several recommendations. The first few are relatively minor points dealing with trails, the registration system, the presence of Coombs cabin, shooting, and the discrepancy between the boundary of the Scenic Area and Roadless Area #275.

Primitive recreation is one of the major resources of the Ten Lakes area. To facilitate recreational use the trail network could be expanded and trail heads better marked. The trail leading from Poorman Peak to Rainbow Lake could be connected up with the Robin Creek road to form a loop. Connecting the Foundation-Creek-to-Camp-Creek trail and the summit of it. This might be desirable.

Trails leaving from the edge of timber cuts or spur roads are difficult to find; unmarked trail junctions are confusing. These problems could be alleviated by additional trail signs.

Trail users do not seem to be registering. We saw over ten hikers in two days; another party reported encountering sixteen the previous weekend. Yet we found that no parties had registered during the entire month of July at the registration box just west of Little Therriault Lake. Perhaps the location of the box should be reconsidered in addition to the request for users to register. Without adequate records of use, wise management decisions are impossible.

The old border patrol cabin on Wolverine Lake is slated for removal in the management plan. As stated in the EIS the cabin is causing resource degradation. However, its presence adds historical perspective and augments the recreational experience. The cabin is small and well maintained. There may be better ways of preventing damage to the resource than removing the cabin. The alternative of decreasing resource degradation by closing the road access should be considered as well as the alternative of encouraging dispersal of use.

During our visit we heard numerous gun shots and saw one Columbian ground squirrel dead on the trail. Both the sound of shooting and the sight of the dead animal were unpleasant. Whether or not this type of recreation is compatible with the objectives of a Scenic Area should be determined.

The boundaries of the Roadless Area #275 and the Scenic Area coincide except at the northeast corner (see map #1). Is not that corner of the Scenic Area roadless? If so, why was it not included in the Roadless Area? Is the drawing of the Roadless Area possibly a mistake?

The remaining recommendations are of greater importance and focus on the issue of the size of the Scenic Area.

Perhaps the most significant characteristic of the Ten Lakes area today is the past roading and logging. Roads have been built from all sides to the center of this area until all that remains untouched is an octopus-shaped piece of land with slender arms and a center less than a mile and a half in diameter. The extensive cutting has resulted in water problems necessitating building channels in the Wigwam River drainage to prevent erosion. In addition the logging has reduced significantly the

wilderness quality which is dependent upon an expanse of undisturbed space. From all high points in the area timber cuts and roads are visible in almost all directions; past timber practices have caused a serious deterioration of these views. Grizzly bear require large tracts of undisturbed lands; roads and logging have diminished its territory. Roads also may have lessened the quality of hunting. In summary, logging and roading have seriously affected the values of this roadless area.

Key to the management of the area at this time is prevention of further deterioration of the resources of wildness, scenery, and wildlife and their enhancement wherever possible. We recommend the enlargement of the Scenic Area beyond that proposed in the draft EIS and an expansion of the road closure policy as possible means of achieving this goal. The regulations pertaining to the Scenic Area protect the identified values; an expanded Scenic classification would protect these resources over a larger area. The further closure of roads would diminish the already significant impact they have had, benefit the grizzly bear, and increase the sense of wildness.

Road Closures

Ten Lakes is an unusual area in that it is a high, subalpine fir country still covered by snow in the early summer and also accessible by road. One can drive, for example, by oiled road to the Therriault Lakes campgrounds. The main road along Wigwam River should be kept open to maintain this access. Consideration should also be given to the alternative of closing to public use the roads in Clarence, Stahl, Lick, and Blacktail Creeks. Such closures would enhance the values of wildness

and wildlife. The benefit of such closures on wildlife was stated in the draft EIS. Spur roads are not necessary for recreational access and the possibility of permanent closure where further logging is not planned and their closure to public use where further logging is planned should be studied.

Expansion of the Scenic Area

The Scenic Area could be extended to include management unit #3 (see map #2) in which the recognized values are grizzly bear habitat and water production. According to the EIS in unit #3 timber harvesting would be prohibited except for salvage. The inclusion of this unit in the Scenic Area should be considered. The cost of forfeiting salvage logging should be determined as well as the loss of the option of vegetative manipulation. Since there are numerous snowslides in the area which serve as natural mechanisms for retarding succession and vegetative manipulation can affect bears adversely due to the increased contact with humans, the loss of the option of manipulating vegetation may not be significant.

The Scenic Area could be extended into the southeast arm of the roadless area. Management unit #7 covers a significant portion of this area (see map #2). Viewing has been determined as one of the major objectives of the unit and is given as a reason to restrict road construction and timber harvesting. Management units #6 and 8 cover a large part of the area. Management unit #6 is characterized by "low vegetation productivity due to steepness of slope or rocky, shallow soils, and because of soil and/or hydrologic factors are generally unsuitable for surface development" (p. 44, draft EIS Eureka-Grave Creek Planning Unit). In

management unit #8 viewing has been sighted as a factor important enough to warrant modification of timber harvesting methods. The remainder of the area is classified as management unit #5 which consists of prime timber production areas. The affect that logging in unit #5 will have on unit #4, game winter range, should be determined. The possibility of including the non-prime timber production areas, namely units #6, 7, and 8, in an expanded Scenic Area should be considered. The blocks of unit #5 are small enclaves surrounded by some units of low productivity and others where logging would be restricted to protect the view. Because of this situation, consideration should be given to the possibility of reallocating these blocks and including them in the Scenic Area. The proposed Cat Creek timber sale (2.0 MMBF for fiscal year 1978, see map #3) appears to lie partially within management unit #6 which is not open to logging other than salvage because of steep slopes, thin soils, and generally low productivity. If this is the case, this sale should be re-examined. It should be evaluated also from the standpoint of its effect on the roadless resource. The proposed Griffith Creek sale (2.0 MMBF for 1977) would serve to sever the southeast arm of the roadless area from the rest. It also should be re-evaluated from the viewpoint of the wild and undeveloped resource.

Much of the area between the northeast arm of the roadless area and the southeast arm is classified as management unit #6. Since this unit is not suitable for timber harvest, its inclusion in an expanded Scenic Area should be considered. Due to the exceptional view from Stahl Peak, already marred by the sight of extensive timber cuts in almost all directions, modification of timber harvesting methods and possible reallocation of the portions of unit #5 lying closest to the mountains and their

inclusion in the Scenic Area should be considered. The proposed Stahl Creek timber sale (3.0 MMBF for 1978) seems to overlap in part management unit #6 which is not open to logging except for salvage. This matter needs clarification.

The Scenic Area could be expanded to include the northwest arm of the roadless area. Most of the land in the northwest arm of the Roadless Area has been allocated to management unit #7 (see map #2). In this unit, as mentioned before, viewing is to be given prime consideration and timber harvesting and road building restricted to protect this resource. The effect of logging on game winter range west of the ridge and on the wildness, scenery, and wildlife east of the ridge should be determined also. The benefit of including this tract in the Scenic Area should be estimated as well as the costs of foregoing timber harvesting. The proposed St. Clair Creek timber sale (3.9 MMBF for 1975) should be reconsidered in this light. If a portion of the proposed Burma Flats timber sale (3.0 MMBF for 1978) lies in the Roadless Area, it too should be re-evaluated. The owner of the patented mining claim located just southeast of the summit of Independence Peak has requested access. Alternatives to road access should be considered as well as the impacts of those alternatives. Air access, for example, might be a possibility. Consideration should be given to access to the two remaining claims in anticipation of possible future requests for access.

Many of the values of the Ten Lakes area are dependent upon size. In the past the size of the undeveloped area has been reduced leaving a star-shaped roadless area. The core is already small; the distance between the Lick Creek and Stahl Creek roads is a little over a mile. The

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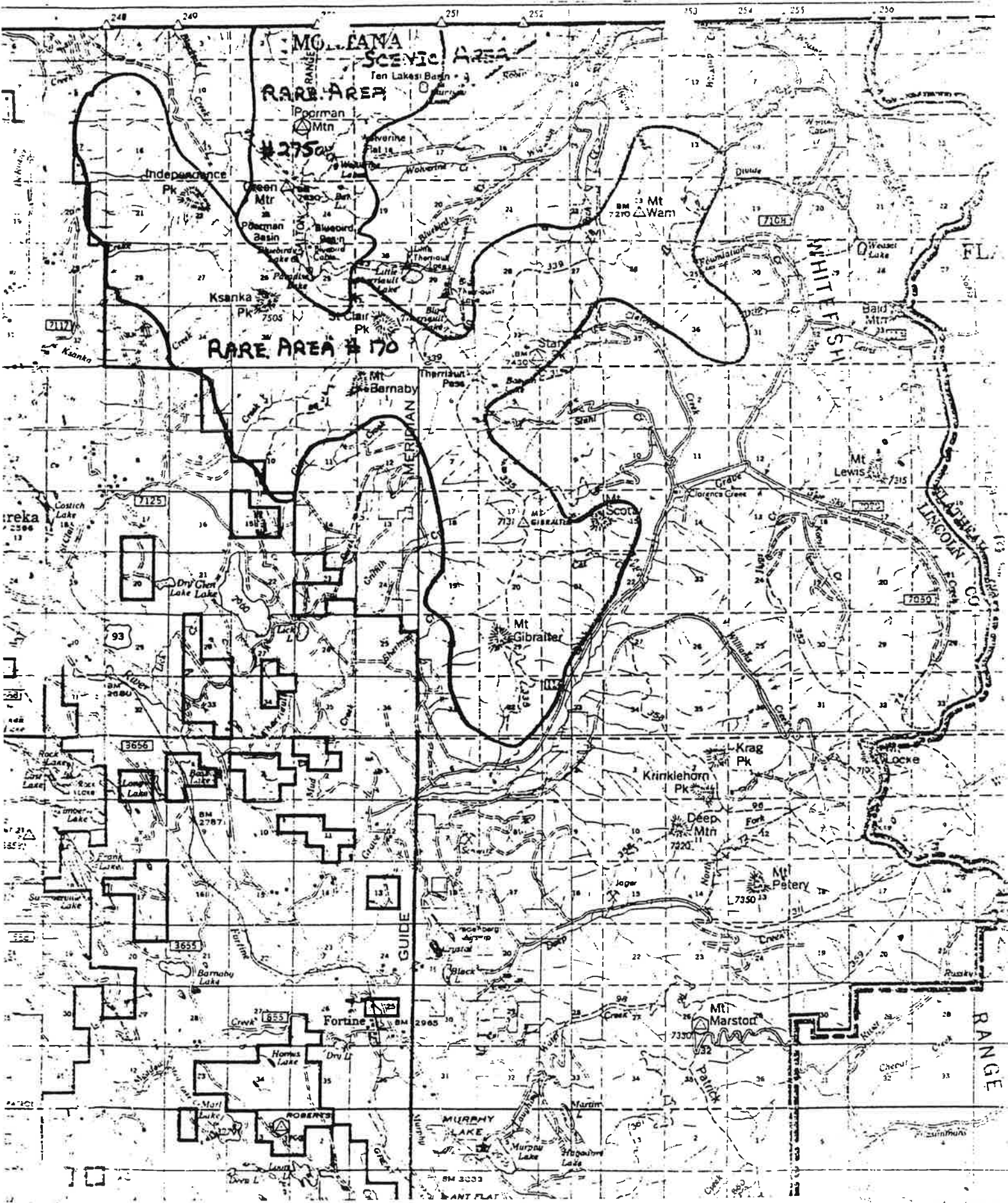
center area serves to link each of the arms. If the core is affected, the arms will be severed and the values dependent on size significantly reduced. For this reason the integrity of the core should be meticulously protected. The proposed Mt. Barnaby sale (1.5 MMBF for 1976) poses a serious threat to this area. The effect of this sale on the wild, scenic, and wildlife resources must be determined. Likewise, any other development between Lick and Stahl Creek roads should be carefully evaluated from the point of view of the roadless resource. Consideration should also be given to the inclusion into the Scenic Area of the portion of management unit #7 which includes Big and Little Therriault Lakes. Salvage logging is permissible in unit #7; however, it could have significant impact on the lake area campgrounds which receive intensive recreational use. The cost of closing this area to salvage work as opposed to the benefits of maintaining a pristine backdrop for these popular lakes should be determined.

Summary

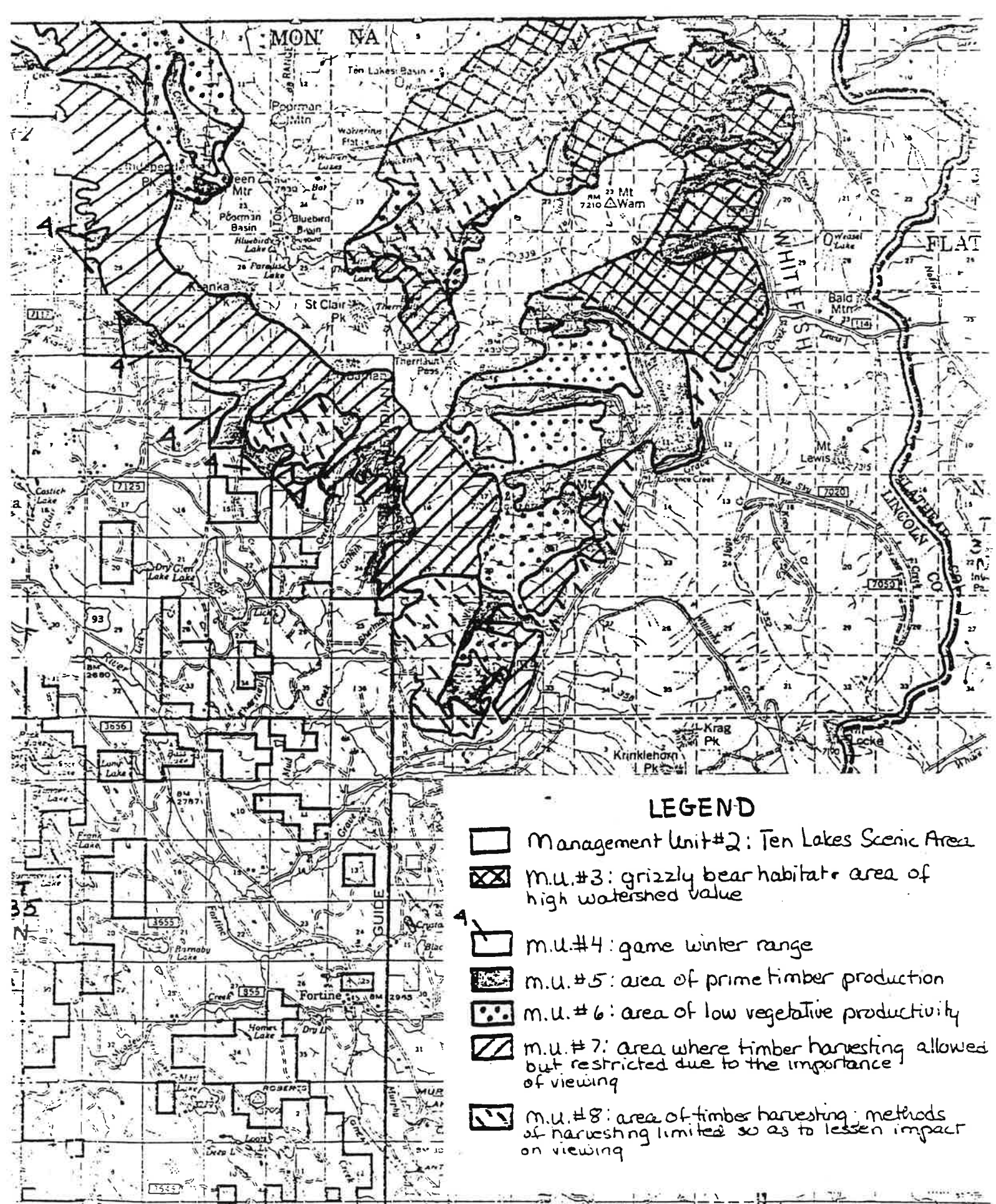
After a trip into the Ten Lakes area and examination of the Ten Lakes area we have developed some concern for the management of the area.

We feel there are several shortcomings in the draft EIS which should be rectified in the final EIS. Each Roadless Area should have been evaluated for its suitability for Wilderness classification. The boundaries of the Roadless Areas, delineated during the RARE process, should have been checked and changed where necessary. The resources of the Ten Lakes areas should have been better identified and their value better determined.

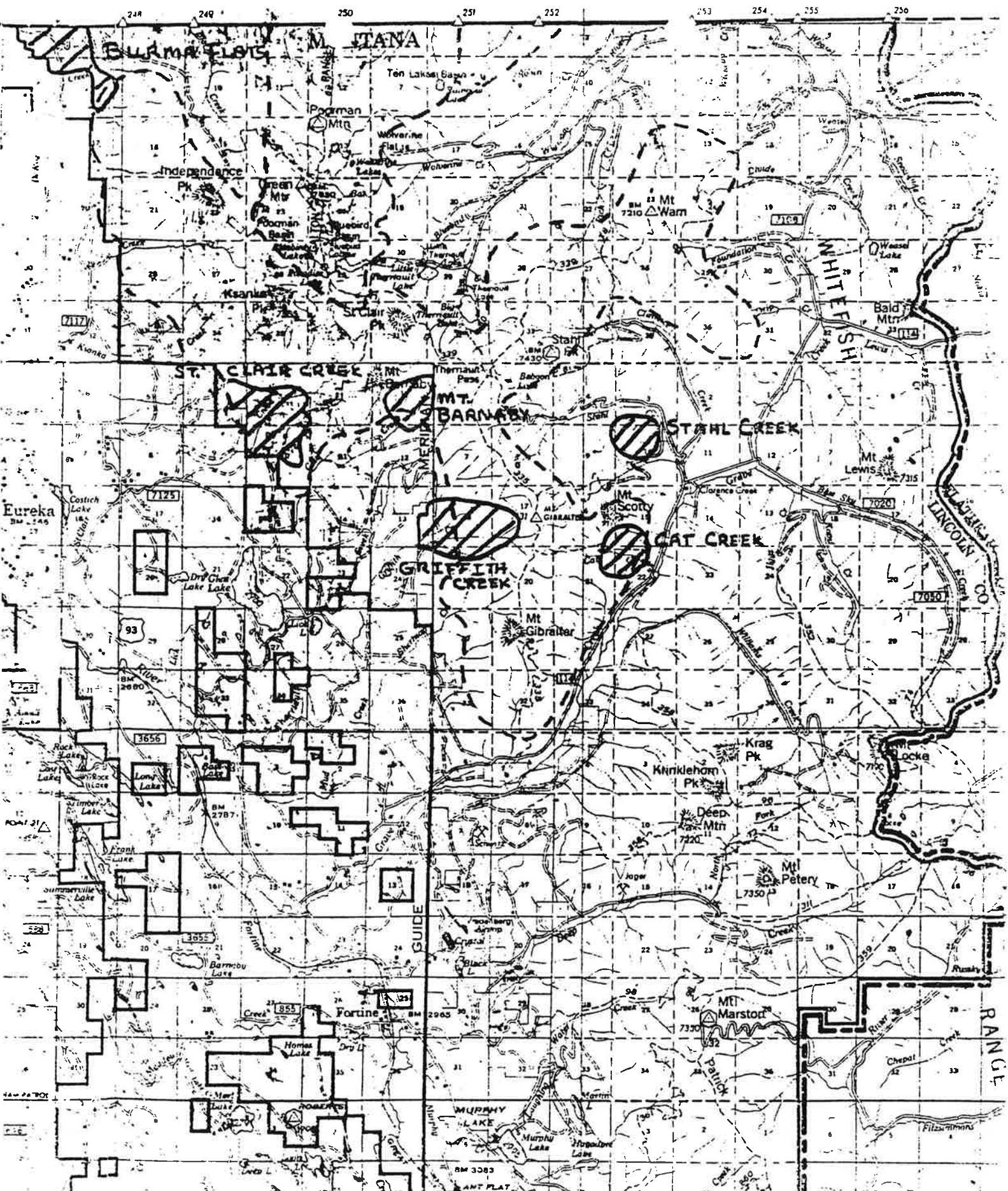
We identified the major values of the area as wildness, scenery, wildlife, and opportunity for primitive recreation. These values are largely dependent on the size of the undeveloped area. Past logging and roading have seriously affected these values. The closure of roads would help to diminish the negative impact. The expansion of the Scenic Area would protect what remains of the resource. We recommend that these options be considered in the revision of the EIS as possible means of protecting these values.



MAP #1: ROADLESS + SCENIC AREAS



MAP#2: PROPOSED MANAGEMENT UNITS



MAP#3: PROPOSED TIMBER SALES

